



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF AIR QUALITY  
Air Compliance Program

610 University Avenue  
Fairbanks, Alaska 99709  
Main: 907-451-5173  
Toll Free: 866-241-2905  
Fax: 907-451-2187  
[www.dec.alaska.gov](http://www.dec.alaska.gov)

**CERTIFIED MAIL: 7018 1830 0000 8008 9597**  
**Return Receipt Requested**

March 18, 2019

Dennis Melton, CPF-1 and CPF-2 Operations Superintendent  
ConocoPhillips Alaska, Inc.  
Kuparuk Central Production Facility #2  
PO Box 196105, NSK-22  
Anchorage, AK 99519

Subject: Air Quality Full Compliance Evaluation for ConocoPhillips Alaska, Inc., Kuparuk Central Production Facility #2, Permit No. AQ0273TVP01, File No. 300.16.407, Tracking No. 19-R0238-37-0001, AT No. 4806

Dear Mr. Melton:

This letter presents you with the Department's Air Quality Full compliance Evaluation (FCE) Report for ConocoPhillips Alaska, Inc. (CPAI), Kuparuk Central Production Facility #2, Permit No. AQ0273TVP01. The evaluation covered the period from April 1, 2017 through February 28, 2019. It was based on a comprehensive review of files and records, and was conducted with or without an on-site visit.

The Department's evaluation discovered non-compliance with Federal requirements 40 CFR 63.6640(e) and 40 CFR 63.6650(f).

**Non-compliance with Condition 3(a) and 3(b):** The permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 1 through 47 listed in Table 1 to reduce visibility through the exhaust effluent by either

- (a) More than 20% for more than three minutes in any one hour, or
- (b) More than 20% averaged over any six consecutive minutes

**Finding(s):** On June 30, 2018 CPAI submitted a permit deviation stating on June 29, 2018 at 06:52, Kuparuk CPF2 began a plant blowdown as part of its test of the facility emergency shutdown (ESD) system. During the flaring, CPAI determined that EU ID 32 exceeded the applicable opacity limits between 10:01 and 13:11 on June 29, 2018. This exceedance in opacity limit triggered permit conditions 3(a) and 3(b). The corrective actions taken include: CPAI reduced the number of wells operating prior to the ESD/blowdown test and managed operation of the flare units to reduce the duration of flaring and black smoke. CPF-2 completed the required ESD blowdown test. Similar reduction in well operations will take place next time a required ESD/blowdown test takes place.

*Clean Air*

**Action(s):** CPAI reported that the event was caused by a required shut down and CPAI took the appropriate measures prior to shut down. Continue to take the appropriate measures prior to required shut downs for required maintenance and testing. No further actions required if compliance is maintained.

**Non-compliance with Condition 60:** The permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50 and, except for those terms or conditions designated in the permit as not federally-enforceable the Clean Air Act, and is grounds for

- 60.1 an enforcement action;
- 60.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
- 60.3 denial of an operating-permit renewal application.

**Finding(s):** The Permittee was in violation of Conditions 3(a) and 3(b), see above permit conditions for more information.

**Non-compliance with 40 CFR 63.6625(i):** (i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

**Finding(s):** On October 29, 2018, CPAI reported in its 3Q18 FOR, deviations from NESHAP 40 CFR 63 Subpart ZZZZ, where CPAI discovered that the analysis for Total Base Number (TBN) was not conducted during the oil sampling for EU IDs 17-29. CPAI stated the emergency engines lacked the TBN from 2013 through 2017 respectively. In the December 4, 2018 FCE Information Request the Department asked CPAI "With regard to EU IDs 15-29, provide 2017 and 2018 NESHAP Subpart ZZZZ maintenance records. Please indicate the operating hours for each unit at the time of service and/or inspection." CPAI provided work orders with notes by the mechanics indicating "The oil must be analyzed for TBN, viscosity, and percent water" for EU IDs 15-29.

**Action(s):** Please provide NESHAP Subpart ZZZZ maintenance records including work orders and oil analysis performed from 2013 through 2017 for EU IDs 17-29. Additionally please provide, if any, NESHAP Subpart ZZZZ work orders and oil analysis record performed in 2018 through January 31, 2019 for EU IDs 17-29 showing the TBN has been added.

**Within 14 days of receipt of this letter, please deliver the records to:**

Compliance Technician  
Alaska Department of Environmental Conservation  
Air Permits Program

Dennis Melton  
Kuparuk Central Production Facility #2  
610 University Avenue  
Fairbanks, AK 99709-3643

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**Or, you may submit these records to [DEC.AQ.Airreports@alaska.gov](mailto:DEC.AQ.Airreports@alaska.gov).**

Under 18 AAC 50.205, make sure you attach to your response a certification statement as follows: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." It must be followed by the signature of the facility's responsible official.

If you have any questions, please contact me at (907) 451-3189 or via email at [breanna.howard@alaska.gov](mailto:breanna.howard@alaska.gov).

Sincerely,



Breanna Howard  
Environmental Program Specialist

Enclosure: 2019 Full Compliance Evaluation for CPF#2  
Onsite Photo Log

cc: Catie Coursen/Brad Broker, CPAI (via email)  
John Pavitt, EPA/AOOO, Anchorage  
Jason Olds, ADEC/ACP, Juneau  
P. Moses Coss, ADEC/ACP, Fairbanks  
Tom Turner, ADEC/ACP, Anchorage